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8
9 **UNITED STATES BANKRUPTCY COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION**
11

12 In re:

13 The Litigation Practice Group P.C.,

14 Debtor.
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Case No. 8:23-bk-10571-SC

Chapter 11

**AMENDED NOTICE OF HEARING ON
AMENDED MOTION FOR ORDER
REJECTING CONSUMER CONTRACTS
WHICH WERE EXCLUDED OR
REMOVED PURSUANT TO 11 U.S.C. §
365**

Date: January 31, 2024
Time: 1:30 P.M. (Pacific Time)
Location: Courtroom 5C¹
411 West Fourth Street
Santa Ana, CA 92701

Objection Deadline: January 17, 2024

28 ¹ Video and audio connection information for each hearing will be provided on Judge Clarkson's
publicly posted hearing calendar, which may be viewed online at: <http://ecf-ciao.cacb.uscourts.gov/CiaoPosted/?jid=SC>.

1 **TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES**
2 **BANKRUPTCY JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, THE**
3 **DEBTOR, CONSUMERS, PARTIES IN INTEREST, AND THEIR COUNSEL OF**
4 **RECORD:**

5 **PLEASE TAKE NOTICE** that, on January 31, 2024 at 1:30 p.m. a hearing will be held
6 before the Honorable Scott C. Clarkson in his Courtroom 5C located at 411 W. Fourth Street, Santa
7 Ana, CA 92701, for the Court to consider the AMENDED MOTION FOR ORDER REJECTING
8 CONSUMER CONTRACTS WHICH WERE EXCLUDED OR REMOVED PURSUANT TO 11
9 U.S.C. § 365; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF;
10 DECLARATION OF RICHARD A. MARSHACK (the “Motion”) filed by Richard A. Marshack,
11 the Chapter 11 Trustee (the “Trustee”) for the bankruptcy estate of The Litigation Practice Group
12 P.C., (the “Debtor”) in the above-captioned bankruptcy case (the “Case”).²

13 **PLEASE TAKE FURTHER NOTICE** that as set forth more fully in the Motion, the
14 Trustee seeks entry of an Order rejecting the consumer client contracts for those clients which
15 were excluded or removed by MLG as provided for in the Agreement of Purchase and Sale and
16 Joint Escrow Instructions dated as of August 4, 2023, by and between the Trustee and MLG (the
17 “Purchase Agreement”) (collectively, the “Rejected Consumer Contracts”).

18 **PLEASE TAKE FURTHER NOTICE** that the Motion is made pursuant to 11 U.S.C. §
19 365 on the grounds that the rejection of the Rejected Consumer Contracts is necessary as it is in
20 the best interests of the Debtor’s Estate and parties in interest.

21 Copies of the Motion are available upon your request from the Trustee's Counsel.

22 **DEADLINE FOR OPPOSITION:** January 17, 2024

23 **PLEASE TAKE FURTHER NOTICE** that, pursuant to LBR 9013-1(f), any response or
24 opposition to the Motion must be (i) in writing and include a complete written statement of all
25 reasons in opposition thereto or in support or joinder thereof, declarations and copies of all
26 photographs and documentary evidence on which the responding party intends to rely and any
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28 ² Capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

1 responding memorandum of points and authorities, and (ii) filed with the Court and served on the
2 Trustee, counsel for the Trustee, the Debtor, and the United States Trustee no later than 14 days
3 prior to the hearing on this Motion.

4 **PLEASE TAKE FURTHER NOTICE** that, pursuant to LBR 9013-1(h) the failure to file
5 and serve a timely response to the Motion may be deemed by the Court to be consent to the granting
6 of the relief requested in the Motion.

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8 Dated: December 27, 2023

Respectfully submitted,

9 DINSMORE & SHOHL LLP

10 By: /s/ Yosina M. Lissebeck
11 Yosina M. Lissebeck
12 Christopher B. Ghio
13 Christopher Celentino
Special Counsel to Richard A. Marshack,
Chapter 11 Trustee
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